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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: February 22, 1993

SUBJECT: Response to PRP's letter concerning USEPA comments on the Field Investigation Plan for the Selmer Company in Elkhart, Indiana

FROM: Doug Yeskis, Geologist
Technical Support Section

TO: Elizabeth Murphy, Attorney
Office of Regional Counsel

As we discussed today, there are several points which need to be addressed concerning the letter recently received by Ken Theisen. The letter raised several objections to our comments, of which we talked about 3 of those comments specifically. Unfortunately, neither of us had a copy of the letter at the moment, so my comments are based on our recollections of the language in the letter.

Deeper Wells I can not specifically discuss the comments concerning the previous conversations on this site related to deeper wells. However, it is possible, although remote, that the shallower wells may not show any VOC contamination, and yet there may be deeper contamination, and even a DNAPL, in the aquifer. In this case, the shallow, water-table wells may intercept sufficient contamination that would compel additional studies at this site.

Ground-water Sampling Devices The PRP's claim that bailers will be sufficient for the purposes of this study and that the bailers were preferable based on studies of sampling devices. As a point of fact, most recent studies (within the past 3-5 years) have concluded the exact opposite, and I can provide them copies on request. In addition, the low-flow, positive displacement sampling pumps will provide better and more consistent results than bailers, **especially at low concentrations.** Bailers may be adequate if high concentrations of contaminants are expected, or if the aquifer is of such a low permeability that a sampling pump can not be used because of insufficient recharge rates. I believe neither of these apply to this site.

Brass Liners for Soil Sampling The PRP's are correct that using a brass liner to obtain a soil sample that is transferred in the field into a bottle would volatilize the soils the same as if no brass liner is used. However, our comment was that the brass liner should be used **and immediately sealed** on site. The liner is not opened until reaching the laboratory and is ready for analysis. This minimizes the loss of volatiles by reducing one handling step (that of transferring from the split spoon into the bottle).

The one item that was not discussed in the letter that I could see

was the taking and recording of water levels during the investigation from the monitoring wells. I believe this is especially important in determining the flow direction at the time of sampling to determine whether the monitoring wells were placed properly.

I hope these comments have been of some assistance to you. Please feel free to call me at 6-0408 if you have any questions.

cc: Ken Theisen, ERS-3